

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

THIS DOCUMENT RELATES TO: ALL CASES

**STACY K HAUER'S APPLICATION FOR APPOINTMENT
TO THE PLAINTIFFS' STEERING COMMITTEE**

I respectfully submit this Application for Appointment to the Plaintiffs' Steering Committee of MDLs 2325, 2326, and 2327. This application is being made in conjunction with the Plaintiffs' Proposed Counsel Organizational Structure previously provided to the Court.

I am a partner at the law firm of Johnson Becker, PLLC based in Minneapolis, Minnesota. I am an attorney in good standing and licensed to practice law in the State of Minnesota¹ and the State of Wisconsin. I have devoted my entire career to representing injury victims, particularly those injured by medical devices and pharmaceutical products. Prior to law school, I received a Master's Degree from the College of Pharmacy at the University of Minnesota; I also spent time working with ill patients as a Certified Nursing Assistant. Given my background in healthcare, I am well qualified to serve on the PSC of a medical device mass tort, including the pelvic mesh MDLs currently pending in this Court.

I have experience in pelvic mesh litigation and can contribute to the PSC in this matter; I currently represent a number of plaintiffs in the pelvic mesh MDLs before this Court, and expect

¹ A certificate of Good Standing for the State of Minnesota is attached hereto as Exhibit A.

that number to grow substantially.² I also currently serve as Co-Lead counsel in the corresponding AMS Minnesota state court litigation (*In re American Medical Systems, Inc. Litigation*, 27-CV-11-3933). As such, I am intimately involved in the AMS pelvic mesh cases and participated in initial case management and discovery in Minnesota. Furthermore, I have experience before this Court as I was appointed to serve on the PSC in MDL 1968: *In re Digitek Products Liability Litigation*. Over the course of my career, I have been involved in numerous medical device and pharmaceutical MDLs, including: MDL 1431: *In re Baycol Products Liability Litigation* (Discovery Committee, Science and Expert Committee); MDL 1535: *In re Welding Fumes Products Liability Litigation* (Trial Team in *Mann v. Lincoln Elec.*); MDL 1596: *In re Zyprexa Products Liability Litigation* (Third Party Payor Discovery Committee); MDL 1708: *In re: Guidant Corp. Implantable Defibrillators Products Liability Litigation* (Co-Chair of Settlement Claim Review Committee); *In re: Medtronic Implantable Cardiac Defibrillators Litigation* (Settlement Claim Review Committee Member); MDL 1943: *In re Levaquin Products Liability Litigation* (Discovery Committee); MDL 2096: *In re Zicam Cold Remedy Marketing Sales Practices and Products Liability Litigation* (Discovery Committee and Science & Expert Committee); and MDL 2197: *In re DePuy Orthopedics, Inc., ASR Hip Implant Products Liability Litigation* (Law and Briefing Committee). Like the cases above, I would welcome the opportunity to serve both this Court, my fellow PSC members and the all of the Plaintiffs involved in this MDL.

² I am counsel of record in the following actions within MDLs 2325, 2326, and 2327: *Martha F. Newman et al. v. Ethicon, Inc. et al.*, U.S.D.C. Southern District of West Virginia, 12-cv-00506, MDL No. 2327; *Daphne M. Markham et al. v. American Medical Systems, Inc.*, U.S.D.C. Southern District of West Virginia, 12-cv-00664, MDL No. 2325; *Sandra J. Barnes et al. v. American Medical Systems, Inc. et al.*, U.S.D.C. Southern District of West Virginia, 12-cv-00782, MDL No. 2325; *Sherri R. Hoak v. Boston Scientific, Inc.*, U.S.D.C. Western District of Pennsylvania, 12-cv-00357 (JPML issued CTO No. 7 on 3/28/12 as Doc. No. 96 regarding MDL No. 2326); *Nancy L. Killinsworth v. Ethicon, Inc. et al.*, U.S.D.C. District of Minnesota, 12-cv-00732 (JPML issued CTO No. 8 on 3/27/12 regarding MDL No. 2327); *Wendy Ackerman v. Boston Scientific Corporation*, U.S.D.C. Southern District of West Virginia, 12-cv-00458, MDL No. 2326.

If selected to the Plaintiffs' Steering Committee, I believe that I and my firm have the resources, willingness and availability to commit to this litigation. As in other cases in which we have been involved, I will stay until the end. I have the ability to work professionally and cooperatively with others, and I have the necessary professional experience in this type of litigation. I also believe this to be true of the other members of the Proposed Plaintiffs Organization Structure provided to the Court, and endorse the proposal. Based upon the foregoing, I respectfully seek Your Honor's appointment to the Plaintiffs' Steering Committee.

Respectfully submitted,

Dated this 30th day of March, 2012.

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